

EXHIBIT C

Deposition of Stephanie Sheehy

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)
_____)

CONFIDENTIAL
VIDEO DEPOSITION OF STEPHANIE SHEEHY
March 5, 2013

REPORTED BY: GINA V. CARBONE, CSR NO. 8249, RPR, CCRR

Deposition of Stephanie Sheehy

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

01:44:55 1 A. The tools group. The tools group.

01:44:59 2 Q. What is the tools group?

01:45:04 3 A. What do you mean what is the tools group? You

01:45:06 4 mean -- can you be more specific, please.

01:45:11 5 Q. If you were to describe to your friend what the

01:45:16 6 tools group at Pixar is, how would you describe it?

01:45:22 7 A. They make our internal tools.

01:45:25 8 Q. What you are referring to here, the tools group

01:45:27 9 that had a higher percentile?

01:45:30 10 A. They make the -- our internal tools.

01:45:32 11 Q. What are your internal tools?

01:45:34 12 A. They're the tools that we use to make films.

01:45:41 13 Q. What are some of the tools that you use to make

01:45:43 14 films?

01:45:46 15 A. I'm not that close to what they create. I

01:45:53 16 don't know.

01:45:54 17 Q. Does it mean proprietary software that Pixar

01:45:58 18 has?

01:46:08 19 A. Yes. I'm sure it includes proprietary

01:46:13 20 software.

01:46:16 21 Q. So the tools group comprises of software

01:46:21 22 engineers?

01:46:24 23 A. There are definitely software engineers in the

01:46:26 24 group.

01:46:26 25 Q. Who else is included in the tools group?

Deposition of Stephanie Sheehy

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

01:46:32 1 A. There are a couple of different job titles --
01:46:41 2 actually, can I just refer back and read some of them?

01:46:45 3 Q. Sure.

01:46:46 4 A. Great. Software engineer, PNG software
01:46:56 5 engineer, senior software engineer, Menve support
01:47:05 6 engineer.

01:47:05 7 (Reporter clarification.)

01:47:05 8 THE WITNESS: Menve, M-E-N-V-E.

01:47:09 9 Those are some examples.

01:47:14 10 MS. CISNEROS: Q. Thank you.

01:47:17 11 [REDACTED]

01:47:19 12 [REDACTED]

01:47:21 13 [REDACTED]

01:47:31 14 [REDACTED]

01:47:36 15 [REDACTED]

01:47:53 16 [REDACTED]

01:48:01 17 [REDACTED]

01:48:19 18 [REDACTED]

01:48:22 19 [REDACTED]

01:48:26 20 [REDACTED]

01:48:34 21 [REDACTED]

01:48:35 22 [REDACTED]

01:48:38 23 [REDACTED]

01:48:45 24 [REDACTED]

01:48:52 25 [REDACTED]

Deposition of Stephanie Sheehy

In Re: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION

01:48:58 1 [REDACTED]

01:49:03 2 [REDACTED]

01:49:26 3 [REDACTED]

01:49:39 4 [REDACTED]

01:49:46 5 [REDACTED]

01:49:52 6 [REDACTED]

01:49:58 7 [REDACTED]

01:50:03 8 [REDACTED]

01:50:07 9 [REDACTED]

01:50:13 10 [REDACTED]

01:50:15 11 [REDACTED]

01:50:24 12 [REDACTED]

01:50:27 13 [REDACTED]

01:50:30 14 [REDACTED]

01:50:31 15 [REDACTED]

01:50:34 16 [REDACTED]

01:50:37 17 [REDACTED]

01:50:41 18 [REDACTED]

01:50:46 19 [REDACTED]

01:50:48 20 [REDACTED]

01:50:50 21 MS. CISNEROS: This needs to be marked as an

01:51:44 22 exhibit. It's PIX00012996.

01:52:06 23 THE REPORTER: Exhibit 1306.

01:52:16 24 (Whereupon, Exhibit 1306 was marked for

01:52:16 25 identification.)

1 I, Gina V. Carbone, Certified Shorthand
2 Reporter licensed in the State of California, License
3 No. 8249, hereby certify that the deponent was by me
4 first duly sworn and the foregoing testimony was
5 reported by me and was thereafter transcribed with
6 computer-aided transcription; that the foregoing is a
7 full, complete, and true record of said proceedings.

8 I further certify that I am not of counsel or
9 attorney for either of any of the parties in the
10 foregoing proceeding and caption named or in any way
11 interested in the outcome of the cause in said caption.

12 The dismantling, unsealing, or unbinding of
13 the original transcript will render the reporter's
14 certificates null and void.

15 In witness whereof, I have hereunto set my
16 hand this day: March 15, 2013.

17 X Reading and Signing was requested.

18 Reading and Signing was waived.

19 Reading and signing was not requested.

20

21

22

23

GINA V. CARBONE

24

CSR 8249, CRR, CCRR

25